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FILE

Canadian Steering Committee on Numbering

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Office of the Secretary  
Federal Communications Commission  
Washington, D.C.  
20554 U.S.A.

SUBJECT: CC DOCKET No. 92-237

The CSCN (Canadian Steering Committee on Numbering) is pleased to have an opportunity to comment on the NOI in the matter of Administration of the North American Numbering Plan. In Canada, the Minister of Communications has the responsibility to oversee the administration of numbering plan resources in Canada, and to ensure that these resources are available to meet the demand for service evolution and that they are managed in the best interests of the public at large. The Canadian Government shares the position taken by the Federal Communications Commission that specific numbering issues should be resolved through the cooperative efforts of the telecommunications industry. To facilitate this process, the CSCN has been established under the auspices of the Department of Communications, and has been given the authority to develop strategies and, appropriate guidelines and procedures that best represent overall interests in numbering planning and implementation for the Canadian telecommunications industry and the users.

With regards to the NOI, we note that in paragraph 9 and Footnote 12, reference is made to the use of NPA 610 in Canada and its possible reassignment as a geographic code. Earlier this year CSCN and the NANP administrator reached agreement on an exchange of SAC 610 for 600 to be completed by October 1993. By that time, the Canadian specialized services will have migrated to 600 and 610 will be available for geographic assignment.

We believe that questions concerning who should administer the NANP and how to improve the administration are subsidiary to two more fundamental questions:

- how should the administration be funded?
- what are the exact roles of the administrator, industry fora and government bodies?

With respect to funding, impartial administration will only both occur and be perceived to occur if funding is provided on the widest industry base practical including all of North America.

We believe that the advisory council mentioned in paragraph 32 of the NOI is key to resolving the issues of the roles of various players. We propose that consensus in the advisory council would be the normal source of direction to the administrator. However, the administrator must be empowered to proceed on urgent issues in the absence of such a consensus. Such a process is predicated on full impartiality in the administrator role both in substance and appearance. The advisory council should have a broad and balanced participation made up of industry, user and government representatives from all of World Zone 1. In such an arrangement, the oversight role of government bodies, including the FCC, would concentrate on policy issues and appeals rather than the ongoing administration.

Any new arrangements will require some time to establish and it is important that the integrity of the present NANP, which is a very good overall plan, be maintained. To this end the present Bellcore administrator should continue at least until an industry agreed Long Term Numbering Plan (LTNP) is established. The finalization of the LTNP is a priority industry concern.

With respect to Feature Group D access codes, competitive long distance service is just starting in Canada and thus we have no experience with 10XXX operation. It has been established in principle that 10XXX codes will be used for selection of long distance carriers in Canada but the actual implementation is still under discussion. A likely result will be a requirement of 100 CIC codes for competitive services in Canada. We fully support that this inquiry explore alternatives to FGD expansion, including possible rules for assignment, recall transfer and use.

Among the other issues listed in the NOI, we believe PCS numbering and local numbering portability are particularly important.

On PCS it is essential to reach an agreed stable definition of the service before fostering its development in order to ensure an orderly and efficient development of numbering arrangements.

Local number portability will be an extremely complex and expensive feature to implement. While the 800 portability experience is relevant it must be noted that each of the 160 geographic NPAs will be equal in complexity and cost to the 800 system plus interactions between NPAs must be considered.

An open issue is whether the funding mechanism adopted for administration should be extended to implement costs for numbering changes that benefit the entire industry.

In conclusion CSCN looks forward to actively participating in the inquiry and requests to be provided with future notices and reports.

Yours sincerely,



A. Lewis  
Chairman, CSCN